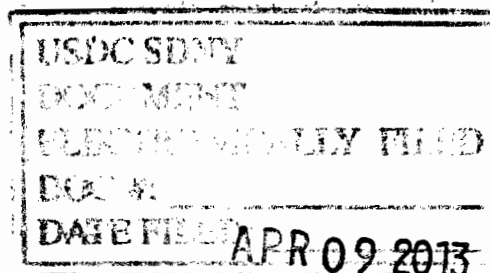


DuaneMorris\*

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April 5, 2013

VIA FACSIMILE: (212) 805-6737

The Honorable George B. Daniels  
United States District Judge  
United States District Court – Southern District of New York  
500 Pearl Street, Courtroom 11A  
New York, NY 10007

SO ORDERED:  
*George B. Daniels*  
George B. Daniels, U.S.D.J.  
APR 09 2013

Re: Joyce De La Rosa v. Tiago Holdings, LLC et al, 13-CV-695 (GBD)

Dear Judge Daniels:

This firm has recently been retained to represent defendant Tiago Holdings, LLC ("Tiago") in the above-captioned Americans with Disabilities Act matter. We write to request an extension of Tiago's time to respond to the allegations contained in Ms. De La Rosa's complaint. To prepare a response to the complaint which is grounded in knowledge, information and belief formed after reasonable inquiry, we must identify, locate and interview persons with knowledge of the allegations, identify, locate and review relevant documents, and conduct a site inspection of the premises in question. Without such an initial investigation, we cannot prepare an appropriate response to the complaint. Accordingly, Tiago respectfully requests that its time to respond to the complaint be extended to May 6, 2013. This is the first such request by Tiago. Plaintiff's counsel has consented to this request.

Thank you for your consideration of this request.

Respectfully,

*Michael Tiliakos*  
Michael Tiliakos

cc: Glen Parker (via email: [ghp@parkerhanski.com](mailto:ghp@parkerhanski.com) and fax: 212-248-5600)  
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